



Alan C. Lloyd, Ph.D.  
Agency Secretary

**California Regional Water Quality Control Board**  
**North Coast Region**  
**Beverly Wasson, Chairperson**

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<http://www.waterboards.ca.gov/northcoast>

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**Arnold**  
**Schwarzenegger**  
Governor

October 5, 2005

Ms. Julie B. Raming  
Georgia-Pacific Corporation  
P.O. Box 105605  
Atlanta, GA 30348-5605

Dear Ms. Raming:

Subject: Interim Remedial Measures Plan

File: Georgia-Pacific Fort Bragg Sawmill, 90 West Redwood Avenue, Fort Bragg  
Case No. 1NMC462

Thank you for the August 19, 2005 submittal from Acton Mickelson Environmental, Inc. (AME), entitled *Addendum #2 to Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*. I reviewed that document and provided comment to you and Mr. Michael Acton of AME in a September 9, 2005 e-mail (enclosed with this letter for reference). We received a response from AME on September 22, 2005, entitled *Response to RWQCB Comments from September 9, 2005 E-mail ....* We have also received two September 28, 2005 documents from AME: *Stormwater Pollution Prevention Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures* and *Revised Appendix D for Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures*.

The March 21, 2005 AME plan *Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures* is hereby approved as modified by the AME submittals dated May 6, 2005, July 18, 2005, August 19, 2005, September 22, 2005, and September 28, 2005, with the following comment:

- The details of the soil screening approach for the leachability of contaminants will need to be submitted to this office and approved before the work begins.

This office also received four sets of public comments on this work. The responses to those comments are enclosed for your reference. However, those responses are not included with cc's to this letter. Anyone interested in obtaining those responses can retrieve them from our website at <http://www.waterboards.ca.gov/northcoast/geninfo/gp/gp.html> or can contact me directly.

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**California Environmental Protection Agency**

Recycled Paper

As I understand from the submittals from AME, this work will not commence before April 15, 2006. The report of this work should be submitted to this office and the electronic submittals made to the GeoTracker system within three months of the completion of the fieldwork. If you have any questions or comments, you may contact me at chunt@waterboards.ca.gov or (707) 570-3767.

Sincerely,

/ORIGINAL SIGNED BY/

Craig Hunt  
Water Resource Control Engineer

100505\_CSH\_tmk\_GPFB\_0510\_IRMApapproval

Enclosures:

1. September 9, 2005 e-mailed comments
2. Responses to public comments

cc: (with September 9, 2005 e-mail comments enclosure only):

Acton Mickelson Environmental, Inc., 5175 Hillsdale Circle, Suite 100,  
El Dorado Hills, CA 95762

Ms. Kay M. Johnson, Tetra Tech, Inc., 3746 Mt. Diablo Boulevard, Suite 300,  
Lafayette, CA 94549

Mr. Doug Heitmeyer, Georgia-Pacific Corporation, 90 West Redwood Avenue,  
Fort Bragg, CA 95437

Ms. Linda Ruffing, Community Development Department, City of Fort Bragg,  
416 N. Franklin Street, Fort Bragg, CA 95437

Mendocino County Environmental Health Department, 501 Low Gap Road,  
Room 1326, Ukiah, CA 95482

Mr. Dave Goble, Public Works Department, 416 N. Franklin Street, Fort Bragg, CA 95437

Mr. Andy Whiteman, City Manager, 416 N. Franklin Street, Fort Bragg, CA 95437

Ms. Loie Rosenkrantz, 17201 Franklin Road, Fort Bragg, CA 95437

Mr. David L. Berry, Department of Toxic Substances Control, P.O. Box 806,  
Sacramento, CA 95812

Ms. Ashle Crocker, Remy, Thomas, Moose, and Manley, 455 Capitol Mall,  
Suite 210, Sacramento, CA 95814

E-mail cc list

**From:** Craig Hunt  
**To:** Michael Acton  
**Date:** 9/9/2005 1:27:05 PM  
**Subject:** More comments

Michael -

Here are some additional comments on the proposed work:

1. Regarding the public comments, what is your response to the questions regarding the air concerns?
2. Also regarding the public comments, what are your responses to the questions regarding storm water runoff?
3. Has an addendum to the SWPPP been submitted? It has not come to Charles Reed, or me who oversees the storm water permit for the site.
4. Are you now planning to wait until after the rainy season to perform this work?
5. In the July 18, 2005 response (Response), under the first comment of the Backfill section, one of the proposed options for capping backfilled areas was to use compacted fine-grained soil. How would the fine-grained soil be protected from erosion by water and wind?
6. In the Response, under the second comment of the Backfill section, from where will your backfill supplier get the backfill?
7. On page 4 of the Response, it was written that "An evaluation of the sampling approach, including sample spacing, will be submitted as part of Addendum #2." I did not find that in the addendum.
8. On page 4 of the Response was the response to our comment "Prior to excavation, soil needs to be sampled and analyzed to establish what contamination is present. It was not explicitly stated that sampling would be done before any soil removal was performed (e.g., of ostensibly contaminated soil)." Part of our comment was that ostensibly contaminated soil should not be removed without first being sampled.
9. Concerning soil leachability, I recommend performing leachability tests on soil samples that have contamination. The leachability tests used are usually the California WET and the TCLP, both modified to use DI water. Leachability testing for TPH and volatiles is usually performed with the TCLP using the volatile compound setup option of the TCLP method. Please note that we usually compare the leachate results to water quality objectives, not hazardous waste parameters. If you are going to want to use some type of screening levels or modeling, that will need to be established and approved beforehand.
10. On page 16 of addendum #2, it was written that "Excavation of debris and fill will generally begin at exposed fill and debris at the top of the coastal bluffs and proceed inland until either debris is absent or chemical concentrations in soil samples are less than risk assessment cleanup goals. Debris removal and excavation will generally be performed above the mean high-tide line." However, on page 15 it was stated that "Debris will be

removed to the extent practicable...”. Please clarify that debris removal will be performed even if soil sample levels are below the cleanup goals.

11. It was stated in workplan #1 that EPA method 5035 would be used in soil sample preservation and handling for VOC analysis. 5035 should also be used with soil samples for TPH-g analysis.
12. One note for workplan #2: although workplan #1 had contained the specification that EPA method 5035 would be used in soil sample preservation and handling for volatiles, I did not find that in workplan #2. Please include that. Also, 5035 should be used with samples for TPH-g analysis as well as those for VOC analysis.

Craig Hunt  
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cc: Cody Walker; Julie Raming; Tuck Vath